

Exhibit M

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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REED GALIN,

Plaintiff,

15-CV-6992 (JMF)

-against-

KUNITAKE HAMADA,

Defendant.

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PLAINTIFF'S RESPONSES TO INTERROGATORIES

Plaintiff Reed Galin responds as follows to defendant's Interrogatories:

INTERROGATORY NO. 1

Identify the existence, custodian, location, and provide a general description of documents relevant to the Action.

What documents exist reside with me and my attorney, Richard Altman. They include transactional documents, Ramus's written records obtained through his bankruptcy in the mid- 1990's, and media accounts of Ramus's story.

INTERROGATORY NO. 2

Identify all persons who have knowledge or information relevant to the Initial Purchase of the Artwork.

David Ramus

Reed Galin

Don Sentell (address unknown. Previous mailing address: c/o Morris W. Macey, Esq, 133 Carnegie Way, NW, Suite 700, Atlanta 30303)

Christie's American Art Dept.

INTERROGATORY NO. 3

Identify all persons who have knowledge or information relevant to the sale of the Artwork to the Coe-Kerr Gallery.

David Ramus
Reed Galin
Don Sentell
Coe-Kerr employees (whom I can not presently identify)
Various creditors of Ramus, and court personnel who would have seen this transaction mentioned in Ramus's paperwork as a result of being involved in his bankruptcy and criminal proceedings in the mid 90's

INTERROGATORY NO. 4

Identify all persons with whom Plaintiff has had any communications concerning the Artwork.

Tomi Galin
Judy Carlisle Holdroyd (Ramus's ex-wife, current address unknown. Previous contacts c/o James W. Hays, Hays & Potter, P.C. 3310 Henderson Mill Road, ste 203, Atlanta GA 30341 c/o George Geeslin, Esq, 1819 Peachtree Road, ste 604, Atlanta GA 30309
Kathryn Ramus (David's ex-wife), address unknown
Attorneys: Richard Altman, Richard Luhan, David Johnson
Elizabeth Beaman (Christies)
Caroline Moustakis (Christies)
Morris Macy (bankruptcy creditors' counsel, also counsel for some creditors)
Don Sentell (address unknown. previous mailing address: c/o Morris W. Macey, Esq, 133 Carnegie Way, NW, ste 700, Atlanta 30303)
David Ramus (address unknown)
Harry Pettigrew (Bankruptcy trustee)
Various art industry personnel over the last 25 years (whose names I don't recall) at the following galleries and museums including, but not limited to:
The Brandywine River Museum (PA)
Chadds Ford Gallery (Barbara Morre, Dir) (PA)
Farnsworth Art Museum (ME)
Adelson Galleries (NY)
Hollis Taggart Gallery (NY)
Owings Gallery (NY)
Gerald Peters Gallery (NY)
Norton Museum of Art (West Palm Beach)
Los Angeles County Museum of Art
Clarke Gallery (Boston, Palm Beach)
Williams American Art (Jim Williams) (Nashville)
Vose Gallery (Boston)
Childs Gallery (Boston)
Hirschl & Adler Galleries (NY)
George Stern Fine Arts (Los Angeles)

Guarisco Gallery (Washington)
Montgomery Gallery (San Francisco)

INTERROGATORY NO. 5

Identify all persons who have rendered an opinion concerning the value of the Artwork.

Christie's
David Ramus

INTERROGATORY NO. 6

Identify all persons with knowledge of the consignment of the Artwork to Ramus.

Reed Galin and David Ramus

Don Sentell

Ramus's creditors and court personnel from his bankruptcy and criminal proceedings who had access to the information revealed in his seized records.

INTERROGATORY NO. 7

Identify all persons who have rendered an opinion concerning the sale of the Artwork to the Coe-Kerr Gallery.

Plaintiff objects to this interrogatory as vague.

U.S. Attorney's office personnel, Atlanta

INTERROGATORY NO. 8

Identify all persons known to be employed by the Coe-Kerr Gallery in 1989.

David Ramus, and others not known.

INTERROGATORY NO. 9

Identify all persons who have knowledge or information relevant to the subject matter of the Action.

I do not know of anyone not previously mentioned who has relevant knowledge about this action

INTERROGATORY NO. 10

Identify all persons (setting forth the name and address of the person and the relationship of the person to Plaintiff) who participated in preparing responses to these interrogatories and who provided information for responding to these interrogatories, and indicate for each person identified the interrogatories that he or she participated in answering.